

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION**

**CORR WIRELESS
COMMUNICATIONS, L.L.C.,
CELLULAR SOUTH, INC., and
CELLULAR SOUTH LICENSES, LLC**

PLAINTIFFS

v.

CIVIL ACTION NO: 3:12CV036-SA-SAA

**AT&T, INC., AT&T MOBILITY LLC,
MOTOROLA SOLUTIONS, INC.,
QUALCOMM INCORPORATED, and
JOHN DOES 1-10**

DEFENDANTS

**MOTOROLA SOLUTIONS, INC.'S MOTION
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendant Motorola Solutions, Inc. respectfully requests an extension of time, through and including Wednesday, May 23, 2012, to respond to Plaintiffs' Complaint.

1. Plaintiffs' lengthy 432-paragraph, 142-paged Complaint was filed on April 2, 2012, and served that same day on Motorola Solutions, Inc.'s registered agent for service of process. Accordingly, Motorola Solutions, Inc.'s response is currently due on or by April 23, 2012. *See* Fed.R.Civ.P. 12(a)(1)(A)(i).

2. Motorola Solutions, Inc. was not given advance notice of the lawsuit or the opportunity to waive service of process pursuant to Federal Rule of Civil Procedure 4(d).

3. Despite the fact that *more* than the customary thirty (30) day extension to the twenty-one (21) day responsive pleading deadline is warranted here given the size of the Complaint, Motorola Solutions, Inc. requested just thirty (30) extra days from Plaintiffs' counsel in which to respond to the Complaint. Plaintiffs' counsel would agree to a twenty-three (23) day extension, but

not thirty (30) days.

4. Preparing a thorough response to Plaintiffs' massive antitrust Complaint requires adequate time to determine the legal basis of any potential dismissal motion and to investigate the allegations contained in the Complaint to which an answer is required.

5. Motorola Solutions, Inc. states unto the Court that granting this Motion would create no undue hardship, burden or prejudice to the Plaintiffs, and that this Motion for Extension of Time to Respond to Plaintiffs' Complaint is not filed for purposes of delay or harassment.

6. For the foregoing reasons, for the reasons expressed in similar extension motions filed by Qualcomm Incorporated, AT&T, Inc. and AT&T Mobility, LLC, and for good cause shown, Motorola Solutions, Inc. moves this Court for an extension of time of thirty (30) days to respond to Plaintiffs' Complaint, allowing it until and including May 23, 2012, in which to file its response. *See Mots. [14-1, 19-1].*

WHEREFORE, PREMISES CONSIDERED, Defendant Motorola Solutions, Inc. requests an extension through and including May 23, 2012, to respond to Plaintiffs' Complaint.

Respectfully submitted, this the 18th day of April, 2012.

MOTOROLA SOLUTIONS, INC.

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CERTIFICATE OF SERVICE

I, JIM M. GREENLEE, of Holcomb Dunbar, P.A., do hereby certify that I have this day electronically filed the foregoing document with the Clerk of the court using the ECF system which sent notification of such filing to all counsel of record, including the following registered participants:

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This, the 18th day of April, 2012.

s/ Jim M. Greenlee
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